

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ASHLEY OSUCHA

Plaintiff,

NOTICE OF MOTION

VS.

ALDEN STATE BANK,
RICHARD D. KOELBL,
JOHN KOELBL

Defendants.

Civ. No.: 1:17-CV-01026-LJV-HBS

PLEASE TAKE NOTICE that Plaintiff, Ashley Osucha, by and through her attorneys, Greco Trapp, PLLC, hereby moves before Hon. Hugh B. Scott, United States Magistrate Judge, at the United State Courthouse, 2 Niagara Square, Buffalo, New York, at a date and time set by the Court for an Order compelling Defendants' compliance with the Court's Order dated December 12, 2019 (Dkt. 42) and an award of fees pursuant to FED. R. CIV. P. 37(b)(2)(C), together with such other and further relief as this Court may deem just and proper.

This motion is based upon all filings filed to date and is supported by the Declaration of Josephine A. Greco, Esq., dated February 26, 2020, together with Exhibits A-G, and the Memorandum of Law, dated February 26, 2020.

Plaintiff intends to file Reply papers in further support of this motion and hereby requests oral argument.

DATED: February 26, 2020
Buffalo, New York

s/Josephine A. Greco
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